



Re: FW: LLBG Permit 
Dave Bartus to: Conaway, Kathy (ECY)

01/05/2010 03:22 PM

From a practical point of view, I very much agree with you, even though I'm very interested in getting into some serious work on LLBG.

That said, my very quick review of the draft very clearly indicates there is absolutely no communication or coordination on the part of LLBG-assigned staff with the rest of Ecology's NWP. My guess is the vast majority of issues identified in the 222-S WAP and the WRAP WAP will need to be addressed in the LLBG WAP. I'm really not very interested in covering the same ground yet again - my hope is that the progress down the learning curve made on 222-S and WRAP be applied to LLBG. Exactly how that occurs, I don't know.

One key difference in the Trench 31/34 WAP is it is one of the few WAPs that will routinely be applied to demonstrating compliance with LDR treatment standards, both method of treatment and concentration-based treatment standards. The attached WAP does not reflect sampling for purposes of demonstrating compliance with concentration-based LDR treatment standards - a critical deficiency.

Also, the attached draft does NOT reflect several policy issues. First, Trench 31/34 do not store wastes, they only dispose of waste. However, I fully expect that as part of the Trench 31/34 unit group, Ecology will authorize a container storage unit for staging of wastes prior to placement in the disposal trenches. Second, Ecology has already decided (quite defensibly and properly) to segregate Trench 31/34 and 94 from all of the unlined trenches. Both need to be reflected in the attached Addendum B.

Let's talk. My guess is your expertise will get called on in one way or another.

"Conaway, Kathy (ECY)"

[I think that we are getting ahead of oursel...](#)

01/05/2010 02:40:30 PM

From: "Conaway, Kathy (ECY)" <KCON461@ECY.WA.GOV>
To: Dave Bartus/R10/USEPA/US@EPA
Date: 01/05/2010 02:40 PM
Subject: FW: LLBG Permit

[I think that we are getting ahead of ourselves with this since we have WRAP and LERF to do and you are working with Deborah on 222-S. I haven't read this yet, however coming from 2 people not permit writers gives me pause.](#)

From: Fearon, Lee (ECY)
Sent: Tuesday, January 05, 2010 1:44 PM
To: Conaway, Kathy (ECY)
Cc: Singleton, Deborah (ECY); Mandis, Michelle (ECY)
Subject: LLBG Permit

[Kathy: Michelle and I are working together on the LLBG permit. I have edited the Draft from 2004 that Deborah wrote. I have attached the edited version. Would you please look over this Draft and guide us in the protocols of how to proceed in the process? Thank you for your help and kind consideration.](#)

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[\[attachment "LLBG Addendum B 2.doc" deleted by Dave Bartus/R10/USEPA/US\]](#)